

U.S. Department of Justice

United States Attorney Eastern District of New York

CP:TK

F.#2010R00420

271 Cadman Plaza East Brooklyn, New York 11201

September 12, 2011

BY FEDEX & ECF

Susan R. Necheles, Esq. 500 Fifth Avenue 29th Floor
New York, NY 10110

Russell M. Gioiella, Esq. 140 Broadway 38th Floor
New York, New York 10005

Re: United States v. Pedro Espada Jr., et al.

Criminal Docket No. 10-985 (FB)

Dear Counsel:

Please find enclosed a DVD labeled "10th Production," which contains scanned copies of documents from the Lobster House restaurant that were provided to the government by the New York State Attorney General's Office. The documents are Batesnumbered LH000001 - LH000005.

Please also find enclosed, on the aforementioned DVD, documents pertaining to Maxwell Noble, a former janitor at Soundview, which documents were provided to the government by the New York State Attorney General's Office. The documents are Bates-numbered Max000001 - Max000022.

Please also find enclosed, on the aforementioned DVD, transcripts of interviews with Pedro Espada Jr. conducted by Donald McLaren. These transcripts can be found in a folder marked "Don McLaren 2006." The recordings from which the transcripts were derived were previously produced to you on January 7, 2011 on two discs marked "Donald McLaren".

Please also find enclosed, on the aforementioned DVD, four videos provided to us by Rafael Alequin, named as follows: (1) "Espada Tracy Towers.wmv" (2) "Espada Attack.wmv" (3) "Espada One Pineapple.wmv" and (4) "Espada Fordham Road.wmv."

Please also find, on the aforementioned DVD, seven videos taken from www.youtube.com, named as follows: (1)

"Residents tell Espada You Don't Live Here.mp4m," dated July 25, 2008; (2) "Sen. Espada Gets Steamed At Protesters.mp4," dated August 4, 2010; (3) "Pedro Espada on Residence Question.mp4," dated July 17. 2009; (4) "Pedro Espada 4.22.10," containing a two-part interview and (5) one folder named "Pedro Espada - Campaign Finance," dated September 2, 2008, also containing a two-part interview.

Please also find enclosed, on a compact disc labeled "Additional Recording," one video taken from $\underline{www.abc.com}$ named as follows: "EYE on NY 4.23.10.wmv."

In addition, this DVD contains images of documents that were recently provided to the government by various parties in response to subpoenas. The documents provided herein are organized according the following table:

File Name/Subpoenaed Party	Bates range
Home Depot	HomeDepot000039
Lehman College	LC000001 - LC000003
Ticketbox2	TB000003 - TB000012
Telecharge	TC000007 - TC000010
Norwich Inn	Norwich000001

This letter additionally confirms the fact that on Tuesday September 7, 2011, an agent of the Internal Revenue Service provided a paralegal from the Law Offices of Hafetz Necheles & Rocco with a hard drive containing the files that were extracted from Soundview employee Ken Brennan's computer during the execution of a search warrant on April 21, 2010.

If you have any further questions or requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/

Todd Kaminsky
Assistant U.S. Attorney

Enclosures